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SOUTHERN DISTRICT OF CALIFORNIA
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'08 CR 2404 DMS

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. MYDGIE RAMIREZ, Defendant.	Criminal Case No. ____________ I N F O R M A T I O N Title 18, U.S.C., Sec. 371- Conspiracy to Commit Mail Fraud; Title 26, U.S.C., Sec. 7206(1)- Filing False Tax Returns

The United States Attorney charges:

Count 1

Beginning in February of 2002 and continuing up to and including May 31, 2005, within the Southern District of California and elsewhere, defendant, MYDGIE RAMIREZ, and another person did knowingly conspire and agree with each other to commit an offense against the United States, that is: mail fraud, in violation of Title 18, United States Code § 1341.

It was the purpose and object of the conspiracy to devise a scheme and artifice to defraud and obtain money from Ranch and Sea Realty and its clients by means of materially false and fraudulent pretenses, representations, and promises, and to execute this fraudulent scheme, by knowingly placing, and causing to be placed, in an authorized depository for mail, certain matters or things to be

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sent or delivered by the United States Postal Service according to the directions thereon.

It was further part of the scheme to defraud Ranch and Sea Realty and its clients by, among other things, writing unauthorized checks from Ranch and Sea client trust accounts, which were deposited into the personal bank account of defendant Ramirez.

OVERT ACT

In furtherance of the conspiracy and to effect and accomplish the objects thereof, the following overt act, among others, was committed within the Southern District of California, and elsewhere:

On or about November 9, 2004, defendant MYDGIE RAMIREZ deposited into her personal bank account a check made payable to her in the amount of $6,200.00 drawn on the Ranch and Sea Trust Account.

All in violation of Title 18 U.S.C. § 371.

Count 2

That on or about June 30, 2006, within the Southern District of California, defendant MYDGIE RAMIREZ, a resident of San Diego County, did willfully make and subscribe a United States Individual Income Tax Return, Form 1040, for the calendar year 2004, which return was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, and which return the defendant did not believe to be true and correct as to every material matter, in that said return reported that the total taxable income was $48,406.00, whereas the defendant well knew and believed that her total taxable income during the year 2004 was an

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amount in excess of 69,319.00; in violation of Title 26, United States Code § 7206(1).

DATED: 7/22/08.

KAREN P. HEWITT
United States Attorney

PAUL S. COOK
Assistant U.S. Attorney

for CHRISTINA M. McCALL
Assistant U.S. Attorney